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February 22, 2021

California Air Resources Board  
Compliance Offsets Protocol Task Force

Dear Task Force,

This comment is made on behalf of the California Council of Land Trusts, which represents over 150 conservation nonprofits in California. We submitted a detailed comment letter regarding the forestry protocols at the initial meeting on November 22, 2019, regarding third party liability for carbon reversals and the buffer pool crediting process for properties with conservation easements.

We are grateful for the work of the Compliance Offsets Protocol Task Force and want to thank the entire Task Force for the substantial amount of effort that has gone into this immense project. We believe the final recommendations advance the legislature's goal of providing ARB with advice on how to create or revise offset protocols with direct environmental benefits in the state and that prioritize benefits to disadvantaged communities, Native American or tribal lands, and rural and agricultural regions. While there is always more work to be done, the report contains important improvements worthy of ARB's consideration.

We appreciate the Task Force's consideration and inclusion of CCLT's suggestions for making the ARB's forest protocol more equitable, remove barriers to participation, better provide for free public recreational access, and better align with permanent, multi-benefit conservation projects developed as part of the project. Adoption of these recommendations will help the protocol be more effective in achieving the overarching goal of reducing climate change impacts.

CCLT believes that the final recommendations represent a further positive step towards growing the credibility and scale of forest carbon credits, while protecting forest ecosystems and working lands. Further, we believe adoption of the recommendations will expand participation and increase benefits to the priority groups and not impair the current rigor and conservatism of the offset program's regulations.

Our belief is that offsets currently contribute a relatively small but important part of the broad set of solutions that will be needed to address climate. No doubt, there is important work yet to be done to fully accomplish our shared goals to reduce greenhouse gas emissions and climate impacts on vulnerable communities. The state's suite of

Jeannette Tuitele-Lewis, Chair  
*Big Sur Land Trust*

Bridget Fithian, Vice Chair  
*Sierra Foothill Conservancy*

Kay Ogden, Secretary  
*Eastern Sierra Land Trust*

David Brunner, Treasurer

Kaila Dettman  
*The Land Conservancy of San Luis Obispo County*

Linus Eukel, Membership &  
Communication Committee Chair  
*John Muir Land Trust*

Kim Koplin, Policy Committee Chair  
*Bolsa Chica Land Trust*

Wendy Millet, LEAD Task Force Chair  
*Tomkat Ranch Educational Foundation*

Walter Moore, Finance Committee Chair  
*Peninsula Open Space Trust*

Harry Pollack  
*Save the Redwoods League*

Mark Silberstein  
*Elkhorn Slough Foundation*

tools and initiatives aiming to achieve these goals implicate many nuanced considerations, raising complex issues for a range of critical constituents.

In all of this, we acknowledge that concerns regarding environmental justice have been raised as part of the Task Force's efforts in regard to the Cap-and-Trade Program as a whole, including offsets. Like all of us who are working towards achieving equitable and just climate solutions, CCLT is committed to listening to and striving to address those concerns as part of the state's continuing efforts to refine its climate programs, while continuing to use offsets as an additional tool to achieve the vast environmental and health co-benefits offered by large land and water conservation projects.

Sincerely,

A handwritten signature in blue ink, reading "Jeannette D. Tuitele-Lewis". The signature is written in a cursive style with a large initial "J".

Jeannette D. Tuitele-Lewis  
Chair, CA Council of Land Trusts